



November 1, 2016

David Sholes
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: Comments on the Westlands Water Quality Coalition Groundwater Quality Management Plan

Dear Mr. Sholes,

Thank you for the opportunity to comment on the Westlands Water Quality Coalition Groundwater Quality Management Plan (hereinafter the “Plan”). We appreciate the Coalition’s level of detail throughout much of the Plan, which does more than several of the other GQMPs to protect groundwater quality. However, the management strategy does little beyond reiterating the requirements of the General Order. The Order is meant to lay out the *minimum* requirements for the Coalitions, who are in turn expected to expand on these requirements where appropriate. Furthermore, the stated goal of the Plan is to “motivate growers to adopt management practices that are protective of groundwater quality,” but it is unclear how the plan will motivate growers in practice.

The Plan acknowledges that while A/R is a useful metric for evaluating best management practices, monitoring of groundwater is also necessary. We agree. We want to see the Plan take a step further, and develop a metric for fertilizer application that takes water quality objectives into account. Such a metric would help growers determine what levels of fertilizer application will be most protective of water quality. We are also pleased to see that growers who are determined to be outliers in their A/R ratio will be subject to additional education requirements, however, as discussed below we do not completely agree on which issues are remediable.

A few additional areas of concern or confusion include:

- **Determination of HVAs:** While we appreciate the inclusion of areas where trend data shows rising nitrate levels, it is concerning that large areas of the HVAs were determined primarily through high levels of TDS rather than nitrates data. While it may be understandable in the absence of adequate nitrates data, the GQMP should include a plan for how to remedy those data gaps and then incorporate the data into HVAs.
- **Groundwater level data:** For several of the sub-basins, the Plan uses data on groundwater levels from the early 2000’s. Considering we are within the fifth year of drought, relying on data from 2000 to show rising groundwater levels is neither appropriate nor an accurate means of depicting the health of the basin. (See p. 49 for one example.)

- **Abandoned wells & well-head protection:** We applaud the Coalition for their plan to review grower's data on improperly abandoned wells and wells lacking adequate well-head protection. However, it is unclear how the Coalition plans to incentivize proper destruction of abandoned wells or implementation of necessary improvements to well-head protection. Following up with growers within HVAs yearly where it has been identified that there are problem wells on farm is a great first step, however the Plan references "incentives" and it is unclear what that incentive is beyond not being questioned by the Coalition annually as to why they have not implemented the recommended practices.
- **High A/R and high-nitrates in irrigation water:** Stating that high A/R ratios which are partially attributable to high levels of nitrates in irrigation water cannot be remedied through any management practices is not accurate. Just as high A/R ratios caused by over-application of fertilizer can be resolved by convincing growers to apply less fertilizer, high A/R from high-nitrates water can also be remedied through reduced application of fertilizer. Growers should take into account the nitrates within their irrigation water when determining how much fertilizer to apply.

Thank you for providing us the opportunity to comment on this document. We look forward to working with your staff and the coalitions on the implementation of this and other Groundwater Management Plans.

Sincerely,



Phoebe Seaton
Executive Director
Leadership Counsel for Justice and Accountability



Laurel Firestone
Co-Executive Director and Attorney at Law
Community Water Center



Jennifer Clary
Water Policy Analyst
Clean Water Action